

Georgia Department of Natural Resources

Environmental Protection Division

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334
Judson H. Turner, Director
(404) 656-4713; Fax. (404) 651-9425

May 20, 2014

VIA EMAIL & REGULAR MAIL

Mr. Jim Schaeffer
McKenzie Tank Lines
975 Appleyard Drive
Tallahassee, Florida 32304

Re: January 2014 Voluntary Remediation Program Application
McKenzie Tank Lines Site, HSI# 10406
Port Wentworth, Chatham County, Georgia
Tax Parcel ID #s 1-0729-01-007 & 1-0729-01-009

Dear Mr. Schaeffer:

The Georgia Environmental Protection Division (EPD) has received the January 29, 2014, Voluntary Investigation and Remediation Plan (VIRP), that has been submitted pursuant to the Georgia Voluntary Remediation Program Act (the Act) O.C.G.A. 12-8-100, by the Environmental International Corporation (EIC) on behalf of McKenzie Tank Lines (MTL). After completing its review of the application, EPD has prepared the following comments:

Conceptual Site Model

- 1) According to previous file information for the subject site, constituents of concern have been detected above the default Type 1 risk reduction standards as deep as 30-ft. below ground surface (former S-7 location), and above the detection limit values as deep as 50-ft below ground surface (former G-16 location). Therefore, please ensure that the additional VIRP site activities include the measures necessary to accurately demonstrate the horizontal and vertical delineation of the groundwater to the established delineation criteria, including the submittal of updated cross sections perpendicular and parallel to groundwater flow that illustrate the depth/orientation of any identified subsurface confining units.
- 2) According to available file information for the site, constituents of concern have been detected above in-stream water quality standards in surface water samples onsite and above detection limit values west of the site as far as the drainage confluence along Highway 25/17 (former G-SR25 sample location). Therefore, please include the collection of surface water samples upstream and downstream of the site, at least to the extent of the referenced drainage confluence west of the site, as part of additional site investigations associated with surface water exposure pathway.
- 3) According to Section 2 of the VIRP, MTL has indicated that there are no current ecological receptors that would be affected by the contamination at the site, but plans for a surface water ecological assessment have been included as part of future proposed actions. Should the additional investigations conducted at the site identify any impacts to the soil(s) or sediment(s) that may contribute to a potential ecological impact, please ensure that the soil and sediment media is incorporated into the planned ecological site assessment if applicable.

- 4) Prior to the November 15, 2014, Progress Report submittal, please make an additional attempt to locate the 31 monitoring locations determined to have an “unknown status”, and ensure that any destroyed or damaged monitoring wells that can be abandoned are properly abandoned in accordance with Section 2.8 of the EPA Region 4 Science and Ecosystem Support Division (SESD) Operating Procedure No. SESDGUID-101-R0 (Design and Installation of Monitoring Wells).
- 5) Site figures illustrate a “Former Office and Shop” structure located in the central portion of the site. Please provide a description of the former property uses associated with this structure, and ensure that any necessary investigation activities are completed for any suspected areas of concern that may be identified as a result of past property uses.

Risk Reduction Standards (RRS) Comments:

- 6) Regarding the planned soil vapor sampling and evaluation of the vapor intrusion potential at the site, please note that EPD recommends that all vapor intrusion screening be conducted against chemical-specific screening levels derived via use of U.S. EPA’s Vapor Intrusion Screening Level1 (VISL) calculator as the values are based on the best available science and toxicity data provided in the Regional Screening Levels (RSL) Table (November 2013).
- 7) The values provided in Table 1-3 appear to be Type 3 RRS values for soil, and not Type 4 RRS. Please revise the table accordingly.
- 8) Table 1-6: The Type 3 surface and subsurface RRS in Table 1-6 are correct for all substances listed except total Xylenes (surface soil), which should be revised to 1,000 mg/kg.
- 9) Please include the VF equation and a sample calculation of the VF for review, and ensure that all chemical-specific parameters for deriving VFs are obtained from the Regional Screening Levels (RSL) Chemical –Specific Parameters Supporting Table2 (Tables 1-7 and 1-8).
- 10) Please revise Table 1-10 to include oral reference doses (RfDo) and oral slope factors (SFo) for the regulated substances.
- 11) Please include a footnote in Table 1-11 to indicate that the final Type 4 groundwater for Xylenes is based on the Type 1/Type 3 groundwater value, or revise the Type 4 RRS to 288 ug/L (i.e., lesser of RAGS, Part B, Equation 1 and 2 values as shown in Table 1-12). Please also revise Table 1-12 to reflect this change.

1 U.S. EPA (March 2012) *Vapor Intrusion Screening Level (VISL) Calculator User’s Guide*. Available online at:

http://www.epa.gov/oswer/vaporintrusion/documents/VISL_UsersGuide_v1.0_Nov2011RSLs.pdf

2 http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm

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The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by MTL. However, failure of EPD to respond to a submittal within any timeframe does not relieve MTL from complying with the provisions, purposes, standards, and policies of the Act.

Should you have any additional questions or concerns please contact Mr. Kevin Collins of the Response and Remediation Program at (404) 463-0530.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Thomas F. Panebianco, McKenzie Tank Lines
Christopher Novack, Georgia Ports Authority
Raj Mahadevaiah, Environmental International Corporation (email only)

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